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March 5, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division;
Docket No. R-2019-3015162**

Dear Secretary Chiavetta:

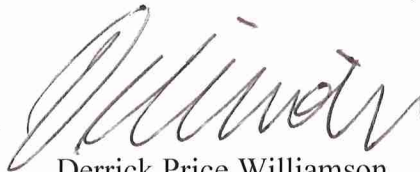
Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of the Industrial Energy Consumers of Pennsylvania ("IECPA"), in the above-referenced matters.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 

Derrick Price Williamson
Barry A. Naum

DPW/sds

Enclosures

c: Deputy Chief Administrative Law Judge Christopher P. Pell (via E-mail and First-Class Mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|--|---|---------------------------|
| Pennsylvania Public Utility Commission | : | |
| | : | |
| v. | : | Docket No. R-2019-3015162 |
| | : | |
| UGI Utilities, Inc. – Gas Division | : | |

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

VIA E-MAIL AND FIRST-CLASS MAIL

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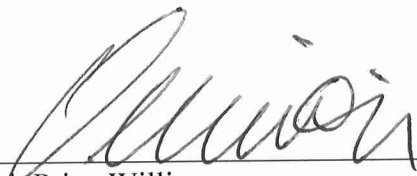
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VIA FIRST-CLASS MAIL

Micah Cameron
40 High Street, Apt. 1
Pittston, PA 18640



Derrick Price Williamson

Dated: March 5, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|--|---|---------------------------|
| Pennsylvania Public Utility Commission | : | |
| | : | |
| v. | : | Docket No. R-2019-3015162 |
| | : | |
| UGI Utilities, Inc. – Gas Division | : | |

**PETITION TO INTERVENE OF
THE INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, Industrial Energy Consumers of Pennsylvania ("IECPA"), hereby file this Petition to Intervene in the above-captioned proceeding.

In support thereof, IECPA states as follows:

1. Petitioner is IECPA. The composition of IECPA at this point in time for purposes of this proceeding is attached as Appendix "A." Appendix "A" will be updated as necessary.

2. The name and address of Petitioners' attorneys are:

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Barry A. Naum
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3. On January 28, 2020, UGI Utilities, Inc. – Gas Division ("UGI" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Company's Supplement No. 6 to UGI Tariff – PA P.U.C. Nos. 7 and 7s ("Filing"), representing a request for a general increase in the Company's annual base rate revenues of \$74.6 million to be effective

March 28, 2018. Statement of Reasons, p. 1. The effective date of new rates was suspended until October 28, 2020, by Order of the Commission issued on February 27, 2020. UGI has also requested an authorized return on common equity ("RoE") of 10.95%. Id. at 8.

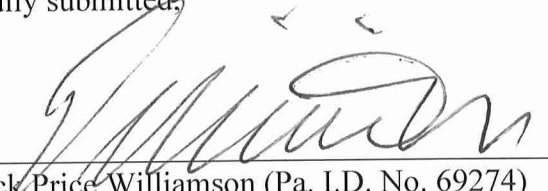
4. IECPA is an association of energy-intensive industrial consumers taking service from UGI primarily pursuant to the Company's current industrial transportation rates. IECPA members provide hundreds of jobs in the UGI service territory in Pennsylvania with millions of dollars in combined annual payroll, and they contribute millions of dollars in annual state, local, and property taxes, over and above the substantial contributions that these corporate citizens make to their local communities and charities. The cost of natural gas services received from UGI is a significant element in the cost of operation for IECPA members, and the reliability and quality of service that IECPA members receive from UGI are also of critical importance to their operations. The Commission's action in this case may therefore have a significant impact on IECPA and the state as a whole, considering the critical role that industries play in the Pennsylvania economy.

6. The resolution of UGI's proposed rate increase, including any changes to the Company's proposal or current tariff that other parties might propose, may directly impact the costs, terms, and conditions of the electric service that IECPA members receive from the Company. IECPA therefore has a direct, substantial, and unique interest in the outcome of this proceeding that is not represented by any other party. See 52 Pa. Code § 5.72(a)(2) & (3).

WHEREFORE, the Industrial Energy Consumers of Pennsylvania requests that the Commission grant this Petition to Intervene and provide IECPA with full party status in this proceeding.

Respectfully submitted,

By



Derrick Price Williamson (Pa. I.D. No. 69274)
Barry A. Naum (Pa. I.D. No. 204869)
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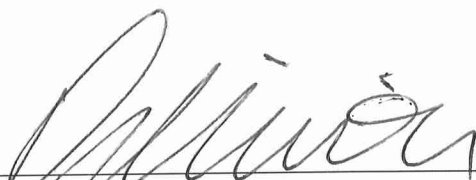
Counsel to Industrial Energy Consumers of Pennsylvania

Dated: March 5, 2020

VERIFICATION

I, Derrick Price Williamson, Counsel to Industrial Energy Consumers of Pennsylvania, hereby state that the factors set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: March 5, 2020



Derrick Price Williamson

APPENDIX A

**MEMBERS OF
THE INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA**

ArcelorMittal USA LLC

Arconic Rolled Products

East Penn Manufacturing Co.